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November 3, 2023

VIA ECF

Hon. Katharine H. Parker
United States Magistrate Judge
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Dear Judge Parker:

As stated in Mr. Radine's letter, the parties engaged in a meet and confer on October 23 to review their respective responses and objections to each side's Requests for Production, as well as to discuss the Court's suggestion that Plaintiffs prepare certain spreadsheets. Both parties stated that they found the meeting productive.

As further outlined in Plaintiffs' letter, the parties have subsequently exchanged correspondence in an effort to identify categories of documents in the Bank's possession that would be relevant and proportional to the needs of the case.

We believe that the ongoing exchange is productive. CAB has been able to confirm to Plaintiffs that it does not have any lists or spreadsheets of prisoner or martyr payments for any time period, and that it does not have Transaction Documents for the period 2000 to 2003. We received Plaintiffs' most recent letter earlier today (Exhibit C to Plaintiffs' Status Report), and we are in the process of preparing a response providing the information Plaintiffs requested.

Although there has been no further production of documents by Plaintiffs since the October 12 conference, we understand from Plaintiffs' that further productions between now and the end of November they will be forthcoming.

We believe that the parties are in agreement as to the status of our ongoing discussions. We regret that a misunderstanding between counsel has resulted in the Court's receipt of two letters. Past practice in this case has been for Plaintiffs to prepare a draft joint status letter with their position,



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so that CAB might respond as necessary, and we anticipated that the same would occur today. We will work to avoid a repeat of this situation in the future.

Respectfully submitted,

/s/ Jonathan Siegfried
Jonathan Siegfried

cc: All Counsel of Record via ECF